

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

JOHN A. MOFFETT,)	CV NO. 03-00130 MLR-BMK
)	
Plaintiff,)	DECLARATION OF LYNNE T. T.
)	TOYOFUKU; EXHIBITS “M” – “T”
vs.)	
)	
SMF SYSTEMS CORPORATION, A)	
MARYLAND CORPORATION; TOM)	
CAFFREY; RUBY CAFFREY; DOE)	
CORPORATIONS 1-20; DOE)	
PARTNERSHIPS 1-20; DOE ENTITIES)	
1-20; JOHN DOES 1-20; JANE DOES 1-)	
20; GOVERNMENTAL AGENCIES 1-20,)	
)	
Defendants.)	
_____)	

DECLARATION OF LYNNE T. T. TOYOFUKU

LYNNE T.T. TOYOFUKU, declares the following:

1. I am an attorney with the law firm of Marr Hipp Jones & Wang, LLP, am licensed to practice law in the State of Hawaii, and have been admitted to practice law before this court. I am one of the attorneys representing Defendants SMF Systems Corporation, Tom Caffrey and Ruby Caffrey (collectively, “Defendants”) in this action.

2. Exhibit “M” are true and correct copies of the invoices from Eleanor’s Legal Support company for service upon Monica Nelson, Thomas Fiester, Dr. Haleh Nekoorad-Long and Dr. Laurence Granston.

3. Exhibit “N” is a true and correct copy of Plaintiff’s Initial Disclosures dated December 17, 2003.

4. Exhibit “O” is a true and correct copy of excerpts from Plaintiff’s Final Pretrial Statement dated April 26, 2005 and a true and correct copy of excerpts from Plaintiff’s First Amended Pretrial Statement dated August 1, 2005.

5. Exhibit “P” are true and correct copies of invoices from Powers & Associates, Pacific Reporting Services Unlimited, MGB Reporting, Inc. and Atkinson-Baker, Inc. for transcripts that Plaintiff contends are insufficient.

6. Exhibit “Q” is a true and correct copy of Motion in Limine 10 to Exclude Testimony of Peter Pay and Plaintiff’s Deposition Designations for Peter Pay both filed on August 29, 2005.

7. Exhibit “R” is a true and correct copy of the General Services Administration (“GSA”) for the Island of Oahu are \$129 per day for lodging and \$77 per day for meals which includes the Table of Maximum Per Diem Rates for Hawaii.

8. Exhibit “S” are true and correct copies of Plaintiff’s Final Witness List dated August 29, 2005 and Plaintiff’s First Amended Final Witness List dated September 6, 2005.

9. Exhibit "T" is a true and correct copy of Defendants' Final
Witness List filed August 29, 2006

Executed on March 1, 2006.

/s/ Lynne T. T. Toyofuku
LYNNE T. T. TOYOFUKU